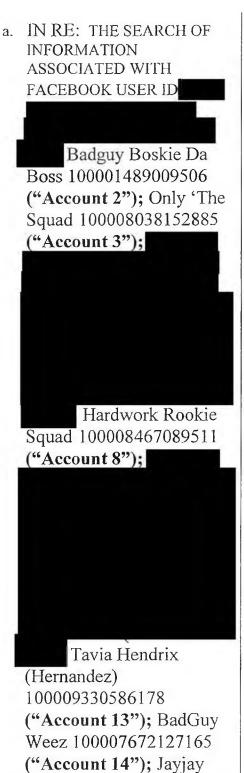
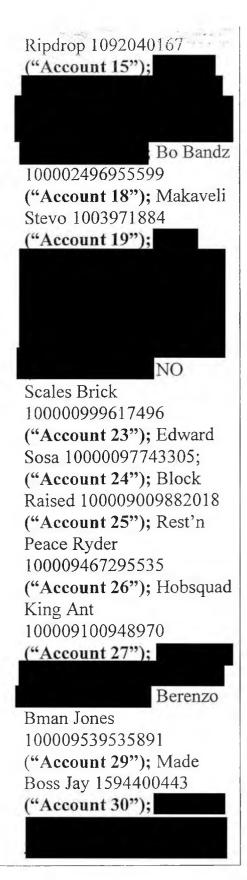
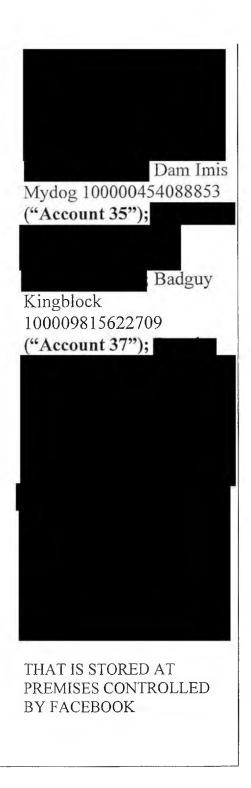
IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF MICHIGAN



Misc. No. 15-mc-51198-G





AFFIDAVIT IN SUPPORT OF AN APPLICATION UNDER RULE 41 FOR A WARRANT TO SEARCH AND SEIZE

- I, Shawn Horvath, being first duly sworn, hereby depose and state as follows:
- 2. I make this affidavit in support of an application for a search warrant for information associated with certain Facebook user ID's that are stored at premises owned, maintained, controlled, or operated by Facebook, a social networking company headquartered in Menlo Park, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Facebook to disclose to the government records and other information in its possession, pertaining to the subscriber or customer associated with the user ID.
- 3. I have been a full-time Border Patrol Agent with the United States
 Border Patrol (USBP) since June of 2009. During my time with USBP I have over
 two years of experience working in a plain clothes investigative and intelligence
 unit, termed DISRUPT. I am currently assigned to the Detroit FBI Violent Gang

Task Force and have been so since September of 2014. I have investigated numerous Federal violations including, but not limited to, controlled substance violations, interstate transportation of commerce, immigration violations, and violent criminal acts. I also hold an Associates of Applied Science in Criminal Justice, a Bachelors of Science in Psychology with a Minor in Communication, and a Master's of Science in Criminal Justice.

- 4. I have been investigating the Seven Mile Bloods gang. I have interviewed numerous members of this gang. I have reviewed several dozen Detroit Police Reports concerning criminal acts done by members of this organization. I am very familiar with the organizational structure of the Seven Mile Bloods in the city of Detroit. My investigation has revealed the following:
 - a. The Seven Mile Bloods are a criminal enterprise, as defined by 18 U.S.C.. § 1961(4) and 18 U.S.C. § 1959(b)(2);
 - b. There is a longstanding and ongoing history of violence being committed by members of the Seven Mile Bloods;
 - c. Members of the Seven Mile Bloods are a close-knit group and that it is not uncommon for many of the members to be involved in related acts of violence; and

- d. Social media outlets are used as a means by some gang members to take credit for violent incidents, communicate with one another about their criminal behavior, and promote the gang.
- ongoing history of violence involving many separate members of the same gang exists, it is not uncommon for the violent members of the gang to associate with each other, and to plan together aggressive acts and/or acts of violent retaliation to be perpetrated by a few members of this violent central cadre. I have also learned that gang members who use their own firearms in gang war situations retain access to those firearms for protection from retaliation and/or frequently pass those firearms to fellow gang members for safekeeping, in order to prevent the weapons from being seized by law enforcement officers pursuant to a search of their residences, vehicles, or persons.
- 6. It is my experience in investigating street gangs that most members are known by street names or monikers to their fellow gang members, and that they frequently write their names or monikers of their associates on walls, furniture, miscellaneous items, and/or papers, both within their residences or their vehicles. I also know based on my training and experience that these monikers are often used as, or incorporated into, the accounts and user names of social media sites used by gang members.

- 7. It is also my experience in the investigation of street gangs that most gang members keep photographs and photograph albums, in which are depicted (a) fellow gang members who are posing and giving hand gang signs that indicate gang identity or affiliation, (b) gang members or associates posing with weapons, particularly firearms that are often used for criminal activities, (c) gang members or associates posing beside vehicles that are occasionally used during the commission of crimes, and (d) gang members or associates posing at locations that are known to be specific gang hangouts. Based on my training and experience, I know that gang members will post these types of photographs on social media sites to inform others about their criminal activities.
- 8. I am being assisted in this investigation by multiple sources of information that have provided the FBI with information regarding homicides, assaults, armed robberies, narcotics trafficking, and the detailed structure and membership of various criminal enterprises, especially the Seven Mile Bloods. All of the information provided by these sources of information to the FBI, which has been investigated, was found to be true, and therefore reliable and credible.
- 9. Because the information outlined below is provided for the limited purpose of establishing probable cause, this affidavit does not exhaustively contain each and every fact and detail of which I and other law enforcement officers are aware relating to this investigation.

PROBABLE CAUSE

The Seven Mile Bloods Investigation

- Department (DPD) are conducting a criminal investigation concerning the Seven Mile Bloods criminal street gang and their members, for violations of Title 18, United States Code, Section 1962 (Racketeering Influenced Corrupt Organizations Act); Title 18, United States Code, Section 1959 (Violent Crimes in Aid of Racketeering); Title 18, United States Code, Section 922(g) (Felon in Possession of Firearm); Title 18, United States Code, Section 924(c) (Use of Firearm in Furtherance of a Crime of Violence); Title 21, United States Code, Sections 841, 844 and 846 (distribution, possession, and conspiracy to distribute controlled substances). Based on the facts set forth below, there is probable cause to believe that these offenses have been committed and that evidence of these offenses is located within the Facebook accounts identified below, as further identified in Attachment A.
- 11. Since at least October 2011, the FBI has conducted proactive investigative efforts regarding the criminal activities of the Seven Mile Bloods organization operating in the Detroit, Michigan, area. Since then, the FBI and the Detroit Police Department (DPD) have obtained, and continue to develop,

evidence regarding the nature, scope, structure, and activities of the Seven Mile Bloods, which indicate that this organization is a criminal enterprise engaged in conspiracies to commit federal and state criminal offenses (as is further detailed herein). This evidence has been developed through multiple sources of information, including witness interviews, confidential sources of information, analysis of telephone toll records, searches, arrests, the review of websites (including Facebook records), physical and video surveillance, and the identification and review of historical criminal activities. The various types of information supporting a finding of probable cause will be summarized in greater detail later in this Affidavit.

documented by the FBI and DPD, and is considered by such agencies as one of the more violent criminal enterprises currently operating in the Detroit metropolitan area. Based on the instant investigation, the Seven Mile Bloods organization derives their income from the sale of illegal narcotics, robberies, and a variety of other criminal methods. Some of the illegal narcotics sales and distribution take place in other states, particularly in West Virginia. Further, members of the Seven Mile Bloods have also engaged in shootings, assaults, homicides, and threats of intimidation.

- Bloods members and/or associates are currently operating throughout Detroit, Michigan. This organization has a presence in other states, including West Virginia, and operates from Michigan across state lines, including using interstate communications facilities to conduct gang business, enforce gang discipline, and recruit gang members. The Seven Mile Bloods originated in Detroit, Michigan, and police reports have documented the organization's illegal activity back to 2005. The Seven Mile Bloods is divided into sub-groups known as "sets," which are expected to assist one another, collaborate with one another on criminal activities, and answer to the gang's leaders in Detroit. Some of the names given to these sets are the SMB Kings, SMB Juniors, Hob Squad, 55, and Grinch Gang.
- 14. This investigation has also determined that Seven Mile Bloods commonly utilize a variety of unifying marks, manners, and identifiers, including "gang signs," clothing, and tattoos that are specific to the organizations. Specifically members and associates wear red clothing, utilize the five-pointed star, and the numbers 762 or 55 to symbolize their gang affiliation.
- 15. Investigators have also determined that members of the Seven Mile Bloods utilize cellular phones to communicate with other members to plan specific acts of violence and other crimes, discuss past criminal activity, and to further the

goals of the organization. They also use various social media networks to monitor, track, and communicate in furtherance of the organizations.

- 16. Between October 2011 and August 2015, the FBI and DPD have interviewed multiple individuals, including victims, cooperating witnesses involved or associated with the Seven Mile Bloods, and witnesses to the criminal activities of the Seven Mile Bloods. These interviews detail multi-person conspiracies by the Seven Mile Bloods criminal enterprise to commit murder and attempted murder, armed robbery, homicide, narcotics trafficking, and witness intimidation. The offenses identified from the witnesses' interviews span from approximately 2009 through as recent as August 2015.
- 17. These interviews have identified multiple specific acts of violence conducted on behalf of the Seven Mile Bloods conspiracy, including murders, assaults, and shootings of rival gang members.
- 18. These witness interviews are supported by other sources of information, including police reports, social media posts, physical surveillance, and the identification and review of historical criminal activities.
- 19. Members of the Seven Mile Bloods who are currently incarcerated in federal and state prisons have communicated to members and associates who are

There have been discussions regarding illegal activities, meetings, and members of the Seven Mile Bloods placing money in the accounts of the incarcerated members.

- 20. Law enforcement officers have observed the social media accounts, including Facebook accounts, of numerous identified members of the Seven Mile Bloods gang. Seven Mile Blood members are utilizing their cell phones to post photos and videos to their accounts depicting gang names colors, and hand signs, memorials to dead gang members, organization and structure of their gang, and criminal activity to include, convicted felons in possession of firearms, and possession and use of illegal narcotics.
- 21. For example, on May 19, 2015, law enforcement received information about an Instagram page named 000_big_blood that threatens members of rival gangs including DJUAN PAGE, aka "NEFF," a rival gang member believed to have been murdered by members of the Seven Mile Bloods. A public version of the Instagram page was reviewed and the main title to the page as "da skore we ^7, smokin yo DEAD homies, 42K Gbk fuck neff fuck drew fuck smurf fuck head fuck yo yo fuck twin dey all DEAD". The Instagram page refers and shows a collage of pictures from the funeral of DJUAN PAGE. The account user, 000_big_blood, posts under the picture "Kaught him at DA light like kusin

- Harold." Emjoi's are then pictured with a person and a gun pointed at the person.

 000_big_blood tags numerous Instagram pictures and threatens them by posting to
 his page their picture from their Instagram pages. The account user

 000_big_blood will post information on the person, such as the Instagram page
 with the name of guttaneff. This page is tagged by 000_big_blood stating "U stay
 on 13 mile wit yo girl stop playing roles u know we kumin".
 - 22. Similarly, on September 16, 2015, law enforcement became aware of a party to be held in memory of DEVON MCCLURE, aka "BLOCK," a deceased Seven Mile Blood gang member, at the Crazy Horse Adult Entertainment, located at 8140 Michigan Avenue, Detroit, Michigan, on September 25, 2015. The announcement for the party came in the form of a flyer on an Instagram belonging to associates of the Seven Mile Bloods gang. The name for the party was "Block Day" and a picture of DEVON MCCLURE was used on the flyer.
 - 23. Leading up to the "Block Day" party, social media accounts were reviewed and members and associates of the Seven Mile Bloods were communicating through social media to coordinate their arrival at the party. Additionally, while inside of the Crazy Horse during the event, members of the Seven Mile Bloods were posting photos and videos from inside of the club.

- 24. On or about September 25, 2015, members of the FBI Violent Gang Task Force (VGTF) conducted surveillance in the area of Crazy Horse Adult Entertainment located at 8140 Michigan Avenue, Detroit, Michigan. Known members and associates of the Seven Mile Bloods, including STEVE ARTHUR JR., aka "STEVE-O," BILLY ARNOLD, aka "B-MAN" or "BERENZO," ANDREW THOMAS, aka "CHINO," ARLANDIS SHY, aka "GRYMEE A," JEFFAUN ADAMS, aka "J-ROCK," MARCUS SMITH, MICHAEL GRAY, DEVON PATTERSON, aka "DUCK" or "SOSA," and WILLIE MCCALL were observed arriving at the club.
- 25. STEVE ARTHUR JR. and BILLY ARNOLD departed from the Crazy Horse in a blue 2002 Chevrolet Trailblazer bearing Ohio license plate GJH1851, which had previously been reported stolen. Police Officers of the Detroit Police Department Tactical Response Unit attempted to do a traffic stop and a pursuit ensued. The pursuit terminated on Interstate 94 at Interstate 75. ARTHUR attempted to flee on foot but was quickly apprehended. ARNOLD was arrested inside of the vehicle. The officers recovered a Bushmaster, Model XM15-E2S, Serial# BFI468505, .223 caliber rifle, with a fully loaded 40 round magazine from the rear compartment of the Trailblazer.

- ARLANDIS SHY, ANDREW THOMAS, JEFFAUN ADAMS, and MARCUS SMITH departed from the Crazy Horse in a grey 2015 Dodge Dart bearing Pennsylvania license plate JTN 8782. A fully marked patrol car from the Michigan State Police initiated a traffic stop. Upon recognizing the patrol car, the Dodge accelerated to create distance before slowing down at which time the surveillance vehicle observed an object thrown from the front passenger side of the Dodge in the vicinity of 3644 Medbury Street. The surveillance vehicle returned to the location where the object was thrown and recovered a loaded P89 Ruger 9 millimeter handgun with an extended magazine. When the Dodge pulled over near 6340 East Hancock Street for the Michigan State Police, troopers identified the passenger in the front of the Dodge as ANDREW THOMAS. THOMAS, a convicted felon, was arrested for felon in possession of a firearm.
- 27. The FBI sought and obtained federal search warrants for cellular telephones that were obtained from the above listed vehicles. A subsequent examination of those cellular telephones showed that they contained images of drugs, guns, text messages of violence, and evidence that the cellular telephones were being utilized for the purpose of posting pictures and communications regarding criminal acts on social media, including Facebook.

Specific Facebook Accounts

28. The following Facebook accounts, identified as "Accounts 1 through 42," have been identified by sources and information gathered by the FBI to be associated to or members of the Seven Mile Bloods/Hob Squad.

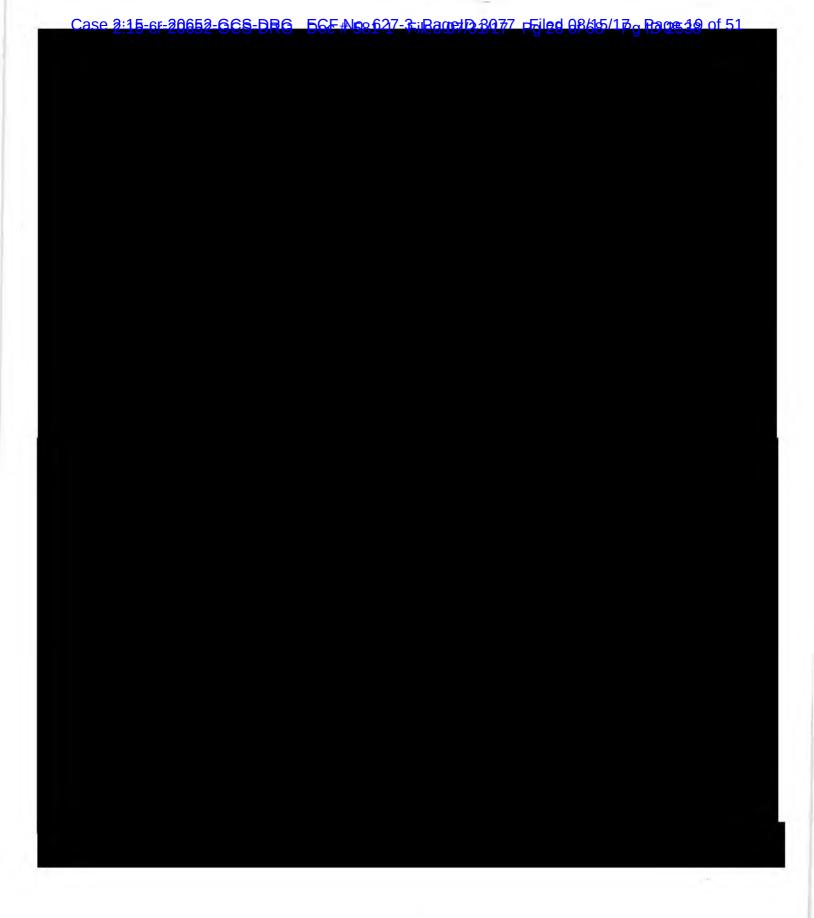




- 30. "Account 2: (Badguy Boskie Da Boss)" has associated posts to "Smb Bloodgang". SMB is the gang's short depiction of Seven Mile Bloods.
 - a. "Account 2" also has postings talking about being "blowed." Based on my training and experience, I believe that the word "blowed" is slang for being under the influence of drugs. There are also postings referencing "Jig", who is identified as DONNELL HENDRIX, a known leader within the Seven Mile Bloods.
- 31. "Account 3: (Only 'The Squad)" has a posted picture with a black male in a t-shirt with the words S.M.B Hob Squad written on the back of it.

- a. "Account 3" has a posted picture of a black male showing gang signs consistent with the Seven Mile Bloods.
- b. "Account 3" also has pictures of BRONNER, and other members who depict groups in the gang as being "Adam", "Grinch", and "55". All of these are street terms used by the Seven Mile Bloods to promote their image.
- c. "Account 3" also has pictures of drugs and guns posted on it.
- d. "Account 3" is also social media friends with "Account 7, 9, 14, 17,23, 28, 31, 32, 33, 38, and 42".



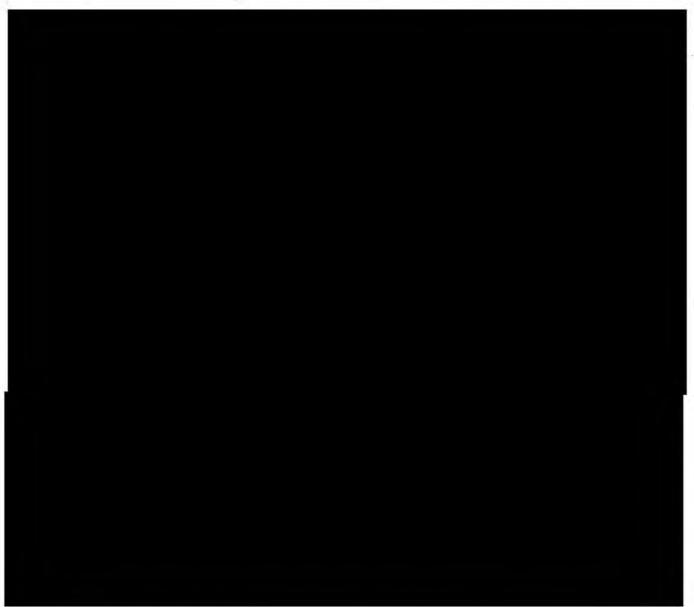




- 36. "Account 8: (Hardwork Rookie Squad)" displays pictures of MCCLURE, and rap videos created by "Account 8" with members of the Seven Mile Bloods. These videos glorify their criminal behavior, and taunt their rival gang members.
 - a. MCCLURE is described above in section 23, and was murdered in 2015. Source reporting shows that his homicide was from a rival gang.
 - b. A search warrant was executed on a vehicle that was involved in a high speed pursuit with Michigan State Troopers and Detroit Police Department during an operation at the Crazy Horse night club, as described above. ARNOLD and ARTHUR were inside the vehicle, as was a Busmaster .223 caliber rifle. Also found inside of the vehicle was a CD depicting the name utilized for "Account 8" (Hardwork Rookie Squad).
 - c. "Account 8" has a social media correlation to "Accounts 9, 10, 11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 23, 24, 27, 29, 30, 32, 35, and 42".







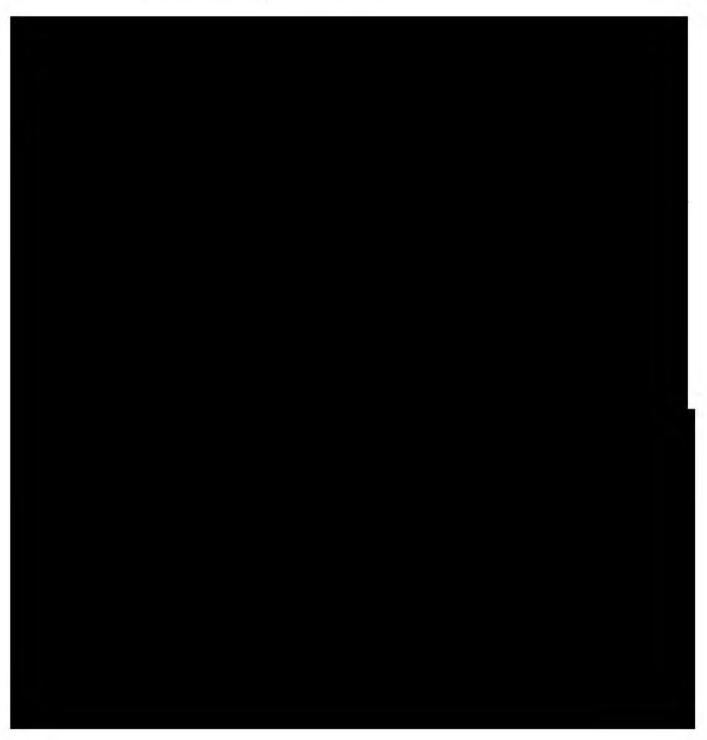
41. "Account 13: (Tavia Hendrix)" displays pictures of TAVIA

HENDRIX, who is identified as a member of the Seven Mile Bloods/Hob Squad.

- a. "Account 13" posts pictures of MCCLURE and GILL.
- b. "Account 13" has a social media correlation with "Accounts 8, 10, 23, 24, 29, 32, 34, and 35".

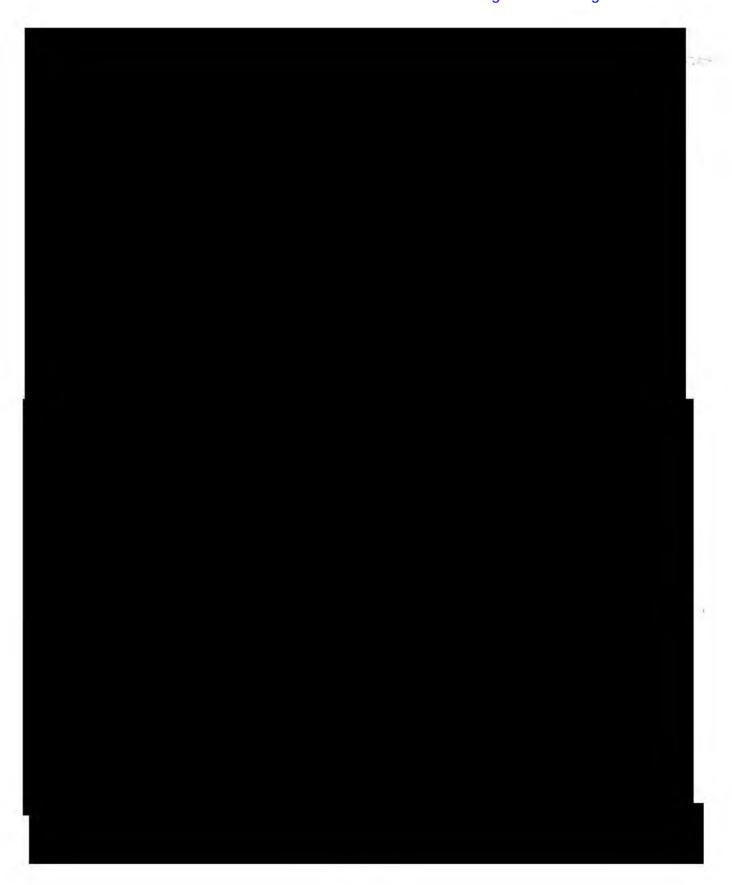
- 42. "Account 14: (BadGuy Weez)" is a black male, who states that he just received three years probation, and is currently on tether.
 - a. "Account 14" has posted pictures for "Ryder's Block" and "Cocaine Sonny", which are MCCLURE and BAILEY respectively.
 - b. "Account 14" has a social media correlation with "Accounts 3, 8, 9, 12, 15, 16, 17, 20, 21, 23, 27, 28, 32, 34, 35, 37, 38, 40, and 42".
- 43. "Account 15: (Jayjay Ripdrop)" is a black male. He identifies himself as a member of the Seven Mile Blood's/Hob Squad through depiction of clothing and gang signs in posted photographs.
 - a. "Account 15" displays members dressed in red at the corner of Navaro and Crusade. This area is a memorial to DEVANTE BURKES, and displays numerous red and black teddy bears along with notes and empty alcohol bottles. BURKES is identified as a known member of the Seven Mile Bloods, who was murdered at this location. Source reporting shows that this homicide occurred from a rival gang. In the picture the members are all displaying gang signs.
 - b. "Account 15" also has pictures of MCCLURE holding a rifle, and another black male holding a gun.

c. "Account 15" has a social media communion to "Accounts 8, 9, 12, 14, 16, 17, 21, 23, 34, 35, and 38".



- 46. "Account 18: (Bo Barrez)" displays pictures of BRANDON BUSH, who is identified as a member of the Seven Mile Bloods. According to Detroit Police Department records BUSH has had law enforcement encounters involving heroin, auto theft, and was the victim in a non fatal shooting.
 - a. "Account 18" displays pictures of MCCLURE.
 - b. "Account 18" also displays pictures of large sums of cash.
- 47. "Account 19: (Makaveli Stevo)" displays black males giving hand gestures consistent with the Seven Mile Bloods, and posts displaying affiliation to the Seven Mile Bloods.
 - a. "Account 19" also displays pictures of ARTHUR, who, as explained above, is identified as a member of the Seven Mile Bloods.
 - b. "Account 19" has a social media correlation with "Accounts 1, 3, 8,23, 24, 32, 34, 35, and 42".







- 51. "Account 23: (No Scales Brick)" displays a picture of IHAB MASLAMANI. Hob Squad is named after MASLAMANI who is a native and citizen of Egypt. He was convicted of murder in 2009. The Seven Mile Bloods and Hob Squad members depict MASLAMANI as one of the founders of the group.
 - a. "Account 23" has posted pictures of MCCLURE.
 - b. "Account 23" has posted pictures from the arrest of DENZEL BIGGS, who is a confirmed member of the Seven Mile Bloods. BIGGS has a tattoo of a red five point star in the center of his throat. This tattoo and symbol is consistent with the Seven Mile Bloods. BIGGS is being charged federally for Felon in Possession of a Firearm.
 - c. "Account 23" has posted pictures of codeine bottles. The Seven Mile Bloods use liquid codeine and alcohol combined to create a drink they refer to as "SIZZRUP".
 - d. "Account 23" has postings of "55" and "Blood Day", which is consistent with the Seven Mile Bloods.

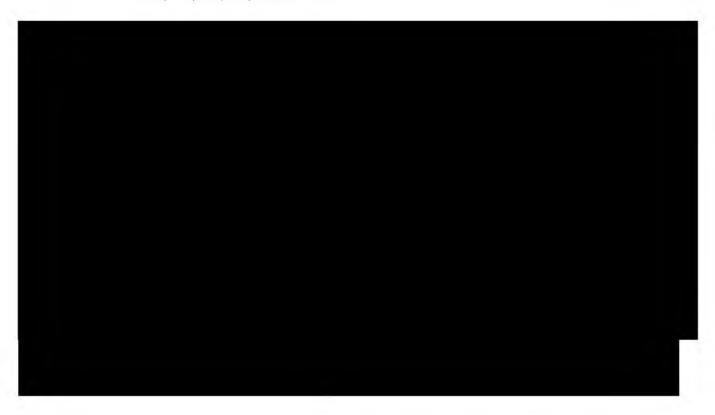
- e. "Account 23" also posted that ARTHUR is a rederal informant. This is a reference the arrest of ARTHUR and ARNOLD listed in the above sections 25 through 27.
- f. "Account 23" has social media correlations with "Accounts 1, 3, 8, 9, 13, 14, 15, 16, 17, 19, 20, 21, 24, 34, 35, 38, and 42".
- 52. "Account 24: (Edward Sosa)" has pictures of MCCLURE, GILL, and PATTERSON. PATTERSON was encountered by law enforcement during the above listed sections 25 through 27 detailing an arrest operation of Seven Mile Bloods at the Crazy Horse.
 - a. PATTERSON was on probation at the time of his encounter at the Crazy Horse, and was physically seen with Seven Mile Blood gang members. Some of the persons listed in sections 25 through 27 are convicted felons. He was also in a vehicle where a gun was seized by law enforcement officials.
 - b. PATTERSON was also involved in a prior law enforcement encounter in 2015, where he fled from Warren Police Department. He led them on a high speed pursuit, and a passenger of the vehicle absconded. It is suspected that ARNOLD was the passenger.

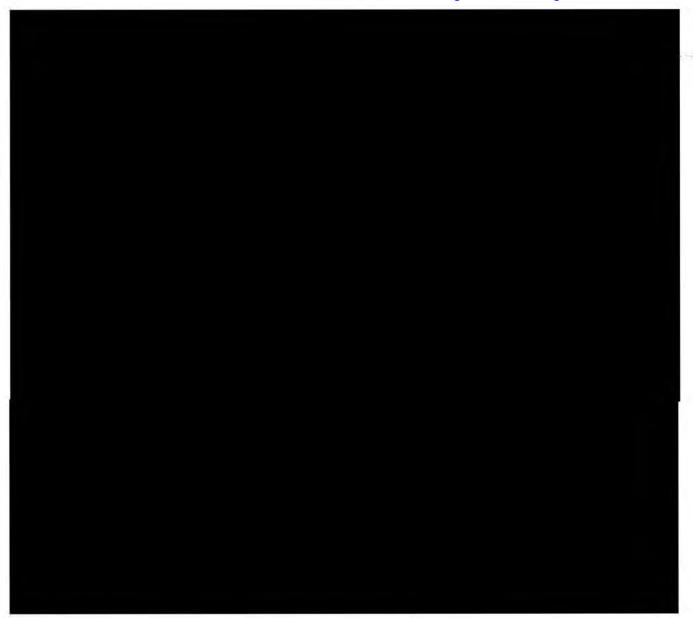
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- c. PATTERSON was arrested == 2011 by the Charleston, WV Police

 Department for Drugs-Delivery of Controlled Substance.
- d. "Account 24" has social media correlations with "Accounts 8, 9, 12, 13, 16, 17, 19, 23, 29, 32, and 35".
- S3. "Account 25: (Block Raised)" and "Account 26: (Rest'n Peace Ryder)" are associated to MCCLURE. A review of these two accounts shows that they appear to be used and managed by Seven Mile Blood gang members, as these accounts pay tribute to deceased members of the Seven Mile Bloods. Members of the Seven Mile Bloods use both of these accounts to glorify their gang activity, as well as their criminal behavior.
- 54. "Account 27: (Hobsquad King Ant)" displays group pictures of members of the Seven Mile Bloods/Hob Squad with 'Hob Squad' written across the photo.
 - a. "Account 27" displays a picture of MCCLURE holding 10 large stacks of money in his arms.
 - b. "Account 27" displays KYLE FLOWERS holding a handgun. KYLE FLOWERS is in another picture with a shirt saying "Free L-Stackz," who is SHEMAR STEVENS. STEVENS is identified as a member of

- the Seven Mile Bloods/Hob-Squad through the Michigan Department of Corrections.
- c. STEVENS was convicted in 2015 for Carrying a Concealed Weapon by the State of Michigan.
- d. FLOWERS was convicted in 2013 by the State of Michigan of Carrying Concealed a Weapon.
- e. "Account 27" also has postings regarding "Red Zone" and "HOB".
- f. "Account 27" has a social media correlation with "Accounts 8, 9, 14, 17, 21, 32, 35, 38, and 42".



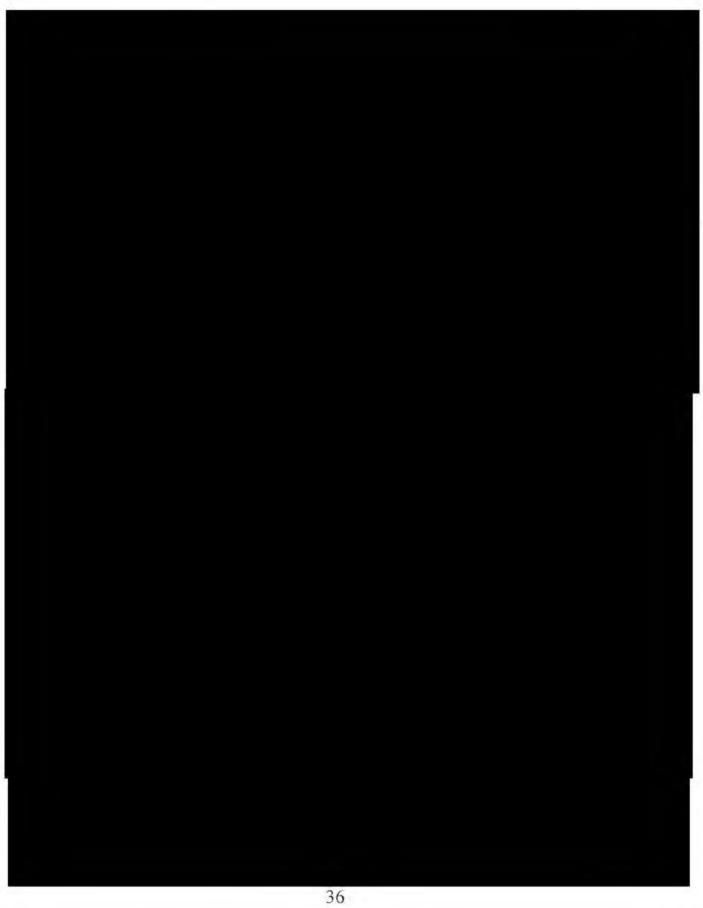


- 56. "Account 29: (Berenzo Bman Jones)" displays numerous pictures of BILLY ARNOLD. ARNOLD is referenced in sections 25 through 27.
 - a. ARNOLD is known to use the names BERENZO and BMAN as street names, and is known by other members of SMB as this.
 - b. A federal search warrant in October of 2015 was issued on four cellphones recovered during the arrest of ARNOLD. It was found

- through data extraction that these phones were being used to upload pictures of weapons and post gang related material to Facebook.
- c. "Account 29" displays ARNOLD in red and black shirt with "55" on the front, which is consistent with the Seven Mile Bloods/Hob Squad.
- d. "Account 29" has a social media correlation with "Accounts 8, 9, 13, 17, 20, 21, 24, 32, and 38".
- 57. "Account 30: (Made Boss Jay)" made a posting of "R.I.P my nigga Block", "55 niggas", "hobb squad", "#gangland", "7 and Gratiot", and "#onbloodz", all of which are consistent with members of the Seven Mile Bloods.
 - a. "Account 30" also displays pictures of members of the Seven Mile Bloods/Hobb Squad posing and displaying gang signs.
 - b. "Account 30" has a social media correlation with "Accounts 1, 8, 9, 32, 33, 34, and 35"









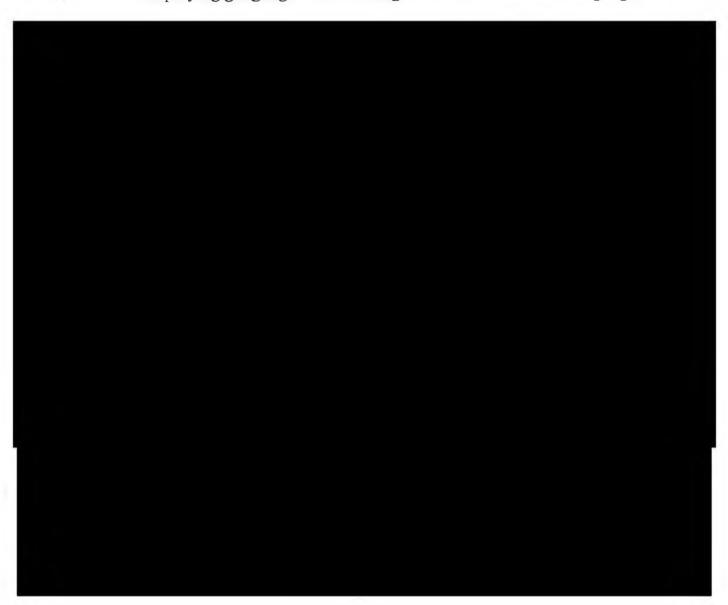
- 62. "Account 35: (Dam Imis My Dog)" displays pictures of ROBERT BROWN, who is identified as a member of the Seven Mile Bloods.
 - a. According to Detroit Police Department records ROBERT BROWN
 has been encountered by law enforcement with ANTHONY
 LOVEJOY, and at locations known to be frequented by the Seven
 Mile Bloods.
 - b. "Account 35" shows pictures of "SONNY", "BLOCK", "GILL", and the corner of Crusade and Novara.
 - c. "Account 35" displays pictures of what appears to be marijuana.

- d. "Account 35" posted the comments of "Manning", "5., 'SMB", "Big Blood", and "#onbloodz". Manning is often referenced as a street in the "Red Zone".
- e. "Account 35" has a social media correlation with "Accounts 1, 8, 9, 10, 12, 14, 15, 16, 17, 19, 20, 21, 23, 24, 27, 28, 30, 32, 33, 34, 38, 40, and 42".

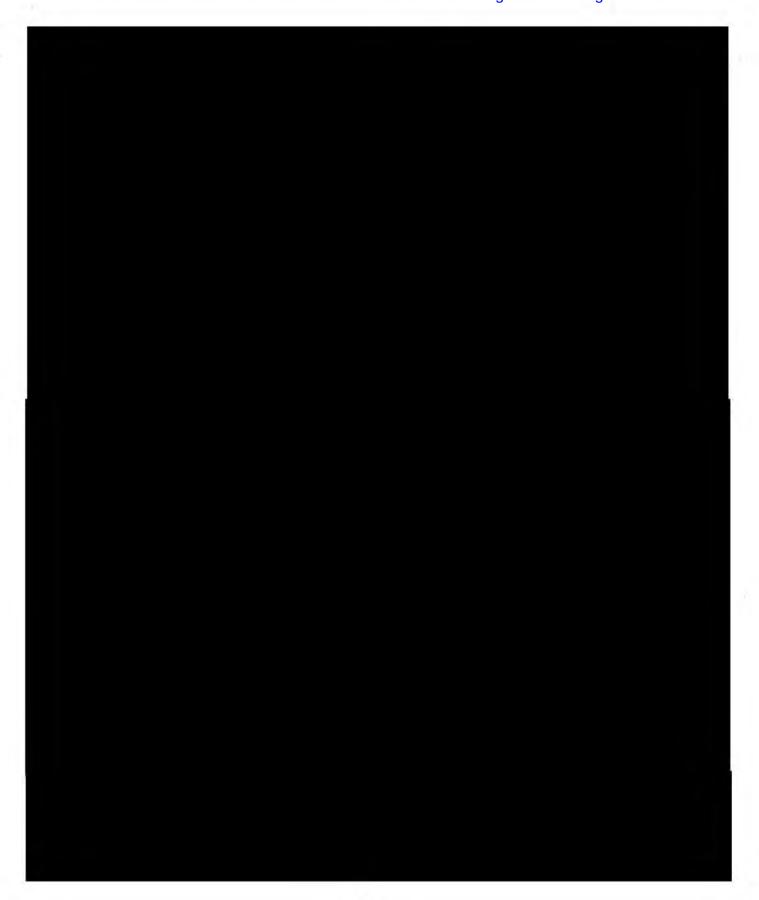


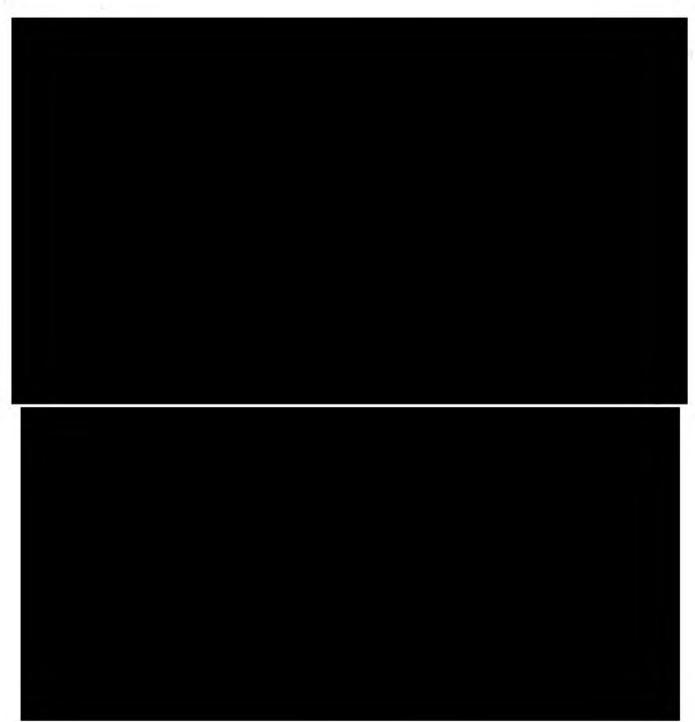
64. "Account 37: (Badguy Kingblock)" uses the user id name of "Block" to show an affiliation to MCCLURE.

- a. "Account 37" has a profile picture of a brack male holding a hand gun with a mounted light, and a background picture of the same black male holding a shotgun.
- b. "Account 37" shows members of the Seven Mile Bloods/Hob Squad displaying gang signs and wearing attire consistent with the gang.









Facebook

70. Facebook owns and operates a free-access social networking website of the same name that can be accessed at http://www.facebook.com. Facebook allows its users to establish accounts with Facebook, and users can then use their 42

accounts to share written news, photographs, videos, and outer information with other Facebook users, and sometimes with the general public.

- 71. Facebook asks users to provide basic contact and personal identifying information to Facebook, either during the registration process or thereafter. This information may include the user's full name, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers (for password retrieval), physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers.

 Facebook also assigns a user identification number to each account.
- 72. Facebook users may join one or more groups or networks to connect and interact with other users who are members of the same group or network.

 Facebook assigns a group identification number to each group. A Facebook user can also connect directly with individual Facebook users by sending each user a "Friend Request." If the recipient of a "Friend Request" accepts the request, then the two users will become "Friends" for purposes of Facebook and can exchange communications or view information about each other. Each Facebook user's account includes a list of that user's "Friends" and a "News Feed," which highlights information about the user's "Friends," such as profile changes, upcoming events, and birthdays.

- 73. Facebook users can select different levels of privacy for the communications and information associated with their Facebook accounts. By adjusting these privacy settings, a Facebook user can make information available only to himself or herself, to particular Facebook users, or to anyone with access to the Internet, including people who are not Facebook users. A Facebook user can also create "lists" of Facebook friends to facilitate the application of these privacy settings. Facebook accounts also include other account settings that users can adjust to control, for example, the types of notifications they receive from Facebook.
- 74. Facebook users can create profiles that include photographs, lists of personal interests, and other information. Facebook users can also post "status" updates about their whereabouts and actions, as well as links to videos, photographs, articles, and other items available elsewhere on the Internet.

 Facebook users can also post information about upcoming "events," such as social occasions, by listing the event's time, location, host, and guest list. In addition, Facebook users can "check in" to particular locations or add their geographic locations to their Facebook posts, thereby revealing their geographic locations at particular dates and times. A particular user's profile page also includes a "Wall," which is a space where the user and his or her "Friends" can post messages,

attachments, and links that will typically be visible to anyone who can view the user's profile.

- 75. Facebook has a Photos application, where users can upload an unlimited number of albums and photos. Another feature of the Photos application is the ability to "tag" (i.e., label) other Facebook users in a photo or video. When a user is tagged in a photo or video, he or she receives a notification of the tag and a link to see the photo or video. For Facebook's purposes, the photos associated with a user's account will include all photos uploaded by that user that have not been deleted, as well as all photos uploaded by any user that have that user tagged in them.
- 76. Facebook users can exchange private messages on Facebook with other users. These messages, which are similar to e-mail messages, are sent to the recipient's "Inbox" on Facebook, which also stores copies of messages sent by the recipient, as well as other information. Facebook users can also post comments on the Facebook profiles of other users or on their own profiles; such comments are typically associated with a specific posting or item on the profile. In addition, Facebook has a Chat feature that allows users to send and receive instant messages through Facebook. These chat communications are stored in the chat history for the account. Facebook also has a Video Calling feature, and although Facebook does not record the calls themselves, it does keep records of the date of each call.

- 77. The Facebook-user does not want to interact with another user of Facebook, the first user can "block" the second user from seeing his or her account.
- 78. Facebook has a "like" feature that allows users to give positive feedback or connect to particular pages. Facebook users can "like" Facebook posts or updates, as well as webpages or content on third-party (*i.e.*, non-Facebook) websites. Facebook users can also become "fans" of particular Facebook pages.
- 79. Facebook has a search function that enables its users to search Facebook for keywords, usernames, or pages, among other things.
- 80. Each Facebook account has an activity log, which is a list of the user's posts and other Facebook activities from the inception of the account to the present. The activity log includes stories and photos that the user has been tagged in, as well as connections made through the account, such as "liking" a Facebook page or adding someone as a friend. The activity log is visible to the user but cannot be viewed by people who visit the user's Facebook page.
- 81. Facebook Notes is a blogging feature available to Facebook users, and it enables users to write and post notes or personal web logs ("blogs"), or to import their blogs from other services, such as Xanga, LiveJournal, and Blogger.
- 82. The Facebook Gifts feature allows users to send virtual "gifts" to their friends that appear as icons on the recipient's profile page. Gifts cost money to 46

purchase, and a personalized message can be attached to each gar. Facebook users can also send each other "pokes," which are free and simply result in a notification to the recipient that he or she has been "poked" by the sender.

- 83. Facebook also has a Marketplace feature, which allows users to post free classified ads. Users can post items for sale, housing, jobs, and other items on the Marketplace.
- 84. In addition to the applications described above, Facebook also provides its users with access to thousands of other applications on the Facebook platform. When a Facebook user accesses or uses one of these applications, an update about that the user's access or use of that application may appear on the user's profile page.
- 85. Some Facebook pages are affiliated with groups of users, rather than one individual user. Membership in the group is monitored and regulated by the administrator or head of the group, who can invite new members and reject or accept requests by users to enter. Facebook can identify all users who are currently registered to a particular group and can identify the administrator and/or creator of the group. Facebook uses the term "Group Contact Info" to describe the contact information for the group's creator and/or administrator, as well as a PDF of the current status of the group profile page.

- 86. Facebook uses the term "Neoprint" to describe an expanded view of a given user profile. The "Neoprint" for a given user can include the following information from the user's profile: profile contact information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the user's access and use of Facebook applications.
- 87. Facebook also retains Internet Protocol ("IP") logs for a given user ID or IP address. These logs may contain information about the actions taken by the user ID or IP address on Facebook, including information about the type of action, the date and time of the action, and the user ID and IP address associated with the action. For example, if a user views a Facebook profile, that user's IP log would reflect the fact that the user viewed the profile, and would show when and from what IP address the user did so.
- 88. Social networking providers like Facebook typically retain additional information about their users' accounts, such as information about the length of service (including start date), the types of service utilized, and the means and source of any payments associated with the service (including any credit card or

bank account number). In some cases, Facebook users may communicate directly with Facebook about issues relating to their accounts, such as technical problems, billing inquiries, or complaints from other users. Social networking providers like Facebook typically retain records about such communications, including records of contacts between the user and the provider's support services, as well as records of any actions taken by the provider or user as a result of the communications.

Therefore, the computers of Facebook are likely to contain all the material described above, including stored electronic communications and information concerning subscribers and their use of Facebook, such as account access information, transaction information, and other account information.

INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED

89. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Facebook to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-

authorized persons will review that information to locate the items described in Section II of Attachment B.

CONCLUSION

- 90. Based on the forgoing, I believe there is probable cause to believe that violations of Title 18, United States Code, Section 1962 (Racketeering Influenced Corrupt Organizations Act); Title 18, United States Code, Section 1959 (Violent Crimes in Aid of Racketeering); Title 18, United States Code, Section 922(g) (Felon in Possession of Firearm); Title 18, United States Code, Section 924(c) (Use of Firearm in Furtherance of a Crime of Violence); Title 21, United States Code, Sections 841, 844 and 846 (distribution, possession, and conspiracy to distribute controlled substances), have been committed and that evidence of these offenses is located within the Facebook accounts identified above, as further identified in Attachment A. I request that the Court issue the proposed search warrant for these accounts.
- 91. This Court has jurisdiction to issue the requested warrant because it is "a court of competent jurisdiction" as defined by 18 U.S.C. § 2711. 18 U.S.C. § 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is "a district court of the United States that has jurisdiction over the offense being investigated." 18 U.S.C. § 2711(3)(A)(i).

officer is not required for the service or execution of this warrant.

REQUEST FOR SEALING

93. I further request that the Court order all papers in support of this application, including the affidavit and search warrant, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize that investigation.

Respectfully submitted,

Shawn J. Horvath United States Border Patrol Agent Detroit FBI Violent Gang Task Force

NOV 1 2 2015

Subscribed and sworn to before me on November 9, 2015: MONA K. MAJZOUB

HON. Mona K. Majzoub
UNITED STATES MAGISTRATE JUDGE